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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RAMON LAMAR WARD,

Petitioner,

v.

DEWAYNE BURTON, Warden
Respondent.

Civil Action No.10-12096

UNITED STATES DISTRICT JUDGE(S)
HONORABLE ROBERT CLELAND
HONORABLE LINDA V. PARKER
UNITED STATES MAGISTRATE
R. STEVEN WHALEN

FILED

APR 16 2014

CLERK'S OFFICE-DETROIT
U.S. DISTRICT COURT

PETITIONER'S MOTION FOR APPOINTMENT OF COUNSEL

Petitioner Ramon Lamar Ward, filed a *pro se* Petition for Writ of Habeas Corpus pursuant to 28 U.S.C.A. § 2254 asserting numerous violations to his Constitutional Rights as provided in the attached petition, but most importantly a plea of Actual Innocence. See *Schlup v. Delo*, 513 U.S. 298 (1995); *House v. Bell*, 547 U.S. 518 (2008) and *McQuiggin v. Perkins*, 133 S.Ct. 1924 (2013). All of which are United States Supreme Court cases in which counsel was appointed under proceedings pursuant to 28 USCA § 2254.

Petitioner, Ramon Lamar Ward, pursuant to 28 U.S.C.A. § 1915; 18 U.S.C.A. § 3006A(a)(2)(B) requests this Honorable Court to appoint counsel to represent him in this case for the following reasons:

1. Petitioner is indigent and not able to afford counsel.
2. The issues involved in this case are complex. It will be necessary for Petitioner to deal with complicated issues.

3. The prison limits the hours that Petitioner may have access to the prison library.

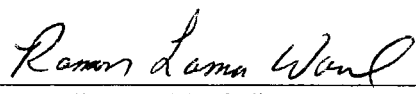
4. Petitioner has a limited knowledge of the law as well as a limited educational background.

5. The ends of justice would best be served in this case if an attorney was appointed to represent the Petitioner.

6. Because Petitioner is a prisoner, he is unable to seek concurrence in the relief sought.

While a prisoner has no constitutional right or statutory rights to appointment of counsel in Habeas Corpus Proceedings, a court does have the discretionary power to appoint counsel. Given the complexity of this case, Petitioner believes that he is a good candidate for such an appointment and prays that the Honorable Court appoint an attorney to represent him in this matter.

Respectfully submitted,



Ramon Lamar Ward, #241756
Petitioner, *in pro se*

Dated: 3-31-14